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United States Government

Department of Energy

memorandum

Richland Operations Office

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DATE: OCT 16 1992

REPLY TO ATTN OF: OPD:RAA

SUBJECT: NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) CATEGORICAL EXCLUSION (CX) DETERMINATION: CLOSURE OF THE 3718-F ALKALI METAL TREATMENT AND STORAGE FACILITY, 300 AREA, HANFORD SITE, RICHLAND, WASHINGTON

TO: C. M. Borgstrom, Director
Office of NEPA Oversight, EH-25, HQ

Using authority delegated to me by the Assistant Secretary for Environmental Restoration and Waste Management (EM-1), I have determined that the following proposed action fits within a Typical Class of Action currently available for Categorical Exclusion (CX) in Subpart D of the U. S. Department of Energy NEPA Implementing Procedure; 10 CFR 1021.

The enclosed CX and its supporting Information Bulletin are provided for your review as required by DOE Order 5440.1D. Any questions you have may be directed to me on (509) 376-7395, or your staff may contact R. A. Almquist of the Operations Division/Reactor Programs Branch on (509) 376-2171, or the RL NEPA Compliance Officer, P. F. Dunigan, Jr. on (509) 376-6667.

John D. Wagoner
John D. Wagoner
Manager

Enclosures:
1. CX Determination
2. Information Bulletin

cc w/encl:
D. Henninger, EM-331 (2 copies)
R. Scott, EM-20
R. H. Engelmann, WHC
J. C. Tseng, EM-36
J. L. Wise, WHC
L. P. Duffy, EM-1
M. H. Killinger, PNL, w/o encl.

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R H. ENGELMAN
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CATEGORICAL EXCLUSION FOR CLOSURE OF THE 3718-F ALKALI METAL TREATMENT AND STORAGE FACILITY, 300 AREA, HANFORD SITE, RICHLAND, WASHINGTON

Proposed Action:

The U.S. Department of Energy (DOE), Richland Field Office (RL), proposes to close the existing 3718-F Facility.

Location of Action:

300 Area, Hanford Site, Richland, Washington

Description of Proposed Action:

The proposed action is to close the existing 3718-F Facility which was used to store and treat alkali metal wastes. The facility is a Resource Convervation and Recovery Act (RCRA) treatment, storage, or disposal unit. The facility is no longer in use and waste inventories have been removed. There were no radioactive materials treated at the facility.

Closure would be accomplished by cleaning a burn shed, scrubber system, reaction tanks, and the concrete floors and pads. Samples would be taken from the burn shed interior, the internal surface areas of the scrubber system, the internal surface areas of the reaction tanks, and the concrete floors and pads. Samples would also be taken from adjacent near-surface soils and soils underlying the concrete pads. The sampling data would be compared to action levels to be negotiated with the State of Washington Department of Ecology and would be based on background threshold limits determined by sitewide sampling and levels that are protective of human health and the environment.

If contamination levels are below the action levels, the 3718-F Facility would be closed, the equipment and burn shed would be removed and salvaged, and the building and concrete pads would remain in place. If contamination levels are above the action levels, all contaminated components, including the building, concrete pads and soil, if necessary, would be removed and disposed of in a RCRA approved hazardous waste landfill.

Small amounts of hazardous or nonhazardous solid waste might be generated by the proposed activity. Any waste that is generated would be non-radioactive and would be disposed of in the Hanford Site Solid Waste Landfill or another appropriate site according to all applicable federal and state laws and regulations and DOE orders.

Categorical Exclusion (CX) to be Applied:

The following CX is listed in the DOE National Environmental Policy Act (NEPA) Implementing Procedures. 55 Federal Register 15,151 (1992) (to be codified at 10 Code of Federal Regulations [CFR] 1021, Subpart D).

B6.1 "Removal actions under CERCLA (including those taken as final response actions and those taken before remedial action) and removal-type actions similar in scope under RCRA and other authorities (including those taken as partial closure actions and those taken before corrective action), including treatment (e.g., incineration), recovery, storage, or disposal of wastes at existing facilities currently handling the type of waste involved in the removal action. These actions will meet the CERCLA regulatory cost and time limits or satisfy either of the two regulatory exemptions from those cost and time limits (National Contingency Plan, 40 CFR part 300). These actions include, but are not limited to:
....."

This CX is appropriate because the action would not have a significant effect on the human environment, and meets the conditions for the CX: does not have extraordinary circumstances; is not connected to other actions with potentially significant impacts; is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211; does not threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety and health, including DOE orders; does not require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities; does not disturb hazardous substances, pollutants, contaminants, or Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)-excluded petroleum or natural gas products that pre-exist in the environment causing uncontrolled or unpermitted releases; does not adversely impact environmentally sensitive resources, such as historic properties, cultural resources, threatened or endangered species, and floodplains and wetlands.

The proposed closure action meets the conditions of Subpart D, B6.1 and would be a removal action under RCRA similar in scope to a removal action under CERCLA and would be completed within the CERCLA cost and time limits of $2,000,000 and a one year duration. Documentation for the project indicating satisfaction of the conditions of this CX will be retained by RL.

I have reviewed the documentation and do not object to the use of this CX.

Signature: Paul F. X. Dunigan Jr.
Paul F. X. Dunigan, Jr.
RL NEPA Compliance Officer

Compliance Action

I have determined that the proposed action meets the requirements for the CX referenced above. Therefore, using the authority delegated to me by the Assistant Secretary of Environmental Restoration and Waste Management, I have determined that the proposed action* may be categorically excluded from further NEPA review and documentation.

Signature: John D. Wagoner 10/16/92
John D. Wagoner, Manager Date
Richland Field Office

EH-25 has reviewed this determination* and has no objection.

Signature: _____ _____
Carol M. Borgstrom, Director Date
Office of NEPA Oversight, EH-25

* Closure of the 3718-F Alkali Metal Treatment and Storage Facility

INFORMATION BULLETIN

PROPOSED ACTION: CLOSURE OF THE 3718-F ALKALI METAL TREATMENT AND STORAGE FACILITY, 300 AREA, HANFORD SITE, RICHLAND, WASHINGTON

DESCRIPTION OF PROPOSED ACTION:

The proposed project would be closure of the existing 3718-F Facility located in the 300 Area of the Hanford Site. The facility is a Resource Conservation and Recovery Act (RCRA) treatment, storage, or disposal unit. The facility, which was used to store and treat alkali metal wastes, is no longer in use, and waste inventories have been removed.

The 3718-F Facility began treatment of alkali metal waste in 1968 and continued this activity until 1987. Storage activities also began in 1968 and continued until 1989. Waste sodium, lithium, and sodium potassium alloy were burned in a burn shed. Equipment contaminated with alkali metals was cleaned using baths of water, methanol, isopropyl alcohol, or 2-butoxy ethanol. The 3718-F Facility also stored high purity sodium and sodium potassium alloy for use in laboratories. Wastes generated at the 3718-F Facility include alkali metal oxides, hydroxides, carbonates, and alcohol solutions. There are no longer any dangerous wastes stored at the 3718-F Facility. There were no radioactive materials treated at the facility.

The 3718-F Facility consists of a single-story storage building made of corrugated steel that sits on a concrete pad with an adjoining loading pad. An adjacent concrete pad contains a burn shed with accompanying fume scrubber, two tanks for cleaning equipment, and a safety shower. The concrete pad is designed for any runoff to drain into a grated trench which drains to the 300 Area process sewer system.

The building, burn shed, and adjacent pads cover a total area of approximately 2,400 square feet.

To facilitate closure, the 3718-F Facility is viewed as consisting of four components: the concrete pads and building floors, the burn shed and scrubber system, the reaction tanks, and the associated near-surface soils. These four components would be evaluated separately. There are no records of spills or contamination in the storage building; however, a limited number of samples would be taken from the building walls. The on-site drain lines to the process sewer system would be addressed under the 300-FF-3 operable unit Comprehensive Environmental Response Compensation and Liabilty Act Remedial Investigation/Feasibility Study (CERCLA RI/FS) process.

The proposed closure actions are summarized as follows:

- The burn shed, scrubber system, reaction tanks, and the concrete floors and pads would be cleaned.
- Samples would be taken from the burn shed interior, the internal surface areas of the scrubber system, the internal surface areas of the reaction tanks, and the concrete floors and pads.

- Samples would also be taken from adjacent near-surface soils and soils underlying the concrete pads.

- The samples would be analyzed and the data compared to action levels developed for closure options. These action levels would be negotiated with the State of Washington Department of Ecology (Ecology) and would be based on background threshold limits determined by sitewide sampling and levels that are protective of human health and the environment.

If contamination levels in the building surface areas and the concrete floors and pads are below the action levels, the 3718-F Facility would be closed, the scrubber equipment and the burn shed would be removed and salvaged, and the storage building and concrete pads would remain in place. If contamination levels are above the action levels and further decontamination is not effective, the contaminated components would be removed and disposed of in a RCRA approved hazardous waste landfill. This could require complete demolition and removal of the building and concrete pads if necessary.

The boundaries of the closure area would be the internal surfaces of the walls and ceiling of the burn shed, the internal surfaces of the scrubber system and the reaction tanks, and two inches into the concrete pads and floors. The closure area would also extend one meter down into the soil under the pads and floors, two meters beyond the perimeter of the concrete pads on the north and east sides, and one meter down into the soil at the seam between the concrete pads.

If contamination of the adjacent soils from 3718-F Facility derived constituents is found to be below the action levels, the soil would be considered clean with respect to 3718-F Facility operations. If soil contamination from 3718-F Facility derived constituents is greater than the action levels, the soil would be remediated under the CERCLA RI/FS process as part of the 300-FF-3 operable unit. If soil contamination is above health based standards, interim action would be taken to bring contamination down to acceptable levels.

All equipment used in performing closure activities would be decontaminated or disposed of at a RCRA-permitted facility.

The estimated cost of the Environmental Management sponsored 3718-F Facility closure is $500,000.

The proposed action would be carried out in accordance with a RCRA Closure Plan for the 3718-F Facility which has been submitted to Ecology and would commence following approval of the closure plan by the state. Closure would be completed within 180 days of approval of the closure plan.

IMPACTS:

The following checklist summarizes environmental impacts that were considered for the proposed action for both construction and operation. All "YES" answers are explained in detail in the text following the checklist.

IMPACT TO THE AIR

	Would the proposed action:	YES	NO
1	Result in gaseous discharges to the environment?	X	
2	Release particulates or drops to the atmosphere?	X	
3	Result in thermal discharges to the environment?	X	
4	Violate federal, state, or local emission standards?		X
5	Cause any other atmospheric disturbance?		X
6	Violate ambient air quality standards (e.g., CO, NO_2)?		X
7	Increase offsite radiation dose to >0.1 mrem (40 CFR 61 Subpart H)?		X

IMPACT TO WATER

	Would the proposed action:	YES	NO
8	Discharge any liquids to the environment?		X
9	Discharge heat to surface or subsurface water?		X
10	Alter stream flow rates?		X
11	Significantly alter natural evaporation rates?		X
12	Release soluble solids to natural waters?		X
13	Provide interconnection between aquifers?		X
14	Require installation of wells?		X
15	Require a Spill Control and Prevention Plan?		X
16	Violate water quality standards (COD, BOD, pH etc.)?		X

IMPACT TO LAND

	Would the proposed action:	YES	NO
17	Conflict with existing zoning or land use?		X
18	Be located on wetlands?		X
19	Be located on the 100-year floodplain?		X
20	Generate non-hazardous solid waste?	X	
21	Create hazardous, radioactive, PCB, or asbestos waste?	X	
22	Cause erosion?		X
23	Impact prime or unique farmland?		X
24	Be located on the Arid Land Ecology Reserve?		X
25	Require an excavation permit?	X	
26	Disturb an undeveloped area?		X

GENERAL

	Would the proposed action:	YES	NO
27	Increase noise level?	X	
28	Adversely impact sensitive species or critical habitat?		X
29	Be within the Hanford Reach Study Area?		X
30	Make a long-term commitment of nonrenewable resources?	X	
31	Require new utilities or modifications to utilities?		X
32	Use pesticides, carcinogens, or toxic chemicals?		X
33	Require a radiation work permit?		X
34	Adversely affect archaeological or historical property?		X

Airborne emissions would be limited to minor amounts of exhaust fumes from vehicles and equipment. Particulate releases to the atmosphere would be limited to small quantities of dust that might occur for short periods as a result of project decontamination and removal activities.

Minor amounts of heat would also be produced by vehicles and equipment during the activities. These activities are not expected to violate any ambient air quality or emission standards.

Handling and disposal of any solid waste that might be generated during project activities would be in accordance with contractor administrative controls and applicable federal and state regulations and guidelines. Any contaminated components or contaminated materials from decontamination or demolition would be removed and disposed of in a RCRA approved hazardous waste landfill. This would not require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities.

If the concrete pads are found to be contaminated above the action levels and further decontamination is not effective, an excavation permit would be required for removal of the pads and contaminated soil under and around the pads.

Noise levels might be increased temporarily in the immediate vicinity as a result of closure activities.

Small amounts of nonrenewable resources (i.e., petroleum products, metals) would be consumed by this project; however, such resources would be consumed on a short-term basis and would cease when closure is complete.

NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) REVIEW

The Westinghouse Hanford Company NEPA Documentation Group has reviewed this project for appropriate NEPA documentation and believes that this project may be covered under a Categorical Exclusion (CX) as defined in the U.S. Department of Energy (DOE) NEPA Implementing Procedures. 55 Federal Register 15,151 (1992) (to be codified at 10 Code of Federal Regulations [CFR] 1021, Subpart D). This CX is included as follows for DOE review and determination:

B6.1 "Removal actions under CERCLA (including those taken as final response actions and those taken before remedial action) and removal-type actions similar in scope under RCRA and other authorities (including those taken as partial closure actions and those taken before corrective action), including treatment (e.g., incineration), recovery, storage, or disposal of wastes at existing facilities currently handling the type of waste involved in the removal action. These actions will meet the CERCLA regulatory cost and time limits or satisfy either of the two regulatory exemptions from those cost and time limits (National Contingency Plan, 40 CFR part 300). These actions include, but are not limited to: ....."

ELIGIBILITY CRITERIA

The proposed closure activity meets the eligibility criteria of 10 CFR 1021.410(b), since there are no extraordinary circumstances that may affect the significance of the environmental effects of the proposal. Further, the proposed activity is not connected to other actions with potentially significant impacts or with cumulatively significant impacts and is not precluded by 10 CFR 1021.211.

The "Integral Elements" of 10 CFR 1021 are satisfied as discussed below:

INTEGRAL ELEMENTS 10 CFR 1021, SUBPART D, APPENDIX B	
Would the Proposed Action:	Comment or explanation:
Threaten a violation of environmental, safety or health laws, regulations, or DOE Orders?	The proposed action would not violate environmental laws, regulations, or DOE Orders.
Require siting, construction or major expansion of waste treatment, storage, or disposal facilities?	The proposed action would not create large amounts of waste. Waste would be disposed of in existing facilities.
Disturb hazardous substances preexisting in the environment, allowing uncontrolled releases?	The proposed action would occur in a possibly contaminated area; however, there would be no uncontrolled or unpermitted releases of hazardous substances. Activities would be performed in accordance with applicable environmental and safety regulations.
Adversely affect archeological or historical property?	The proposed action would occur at a very small site in a previously disturbed area. No cultural resourses would be disturbed.
Adversely affect Federally- or state listed, proposed or candidate, threatened or endangered species or habitat?	The proposed action would occur at a very small site in a previously disturbed area. No species or habitat would be adversely affected.
Adversely affect floodplains or wetlands?	The sites would not be located on 100-year floodplains or within designated wetlands.
Adversely affect wild and scenic rivers, state or Federal wildlife refuges or specially designated areas?	The proposed action would not be located on any specially designated areas.
Affect special sources of water?	The proposed action would not affect special sources of water.

The proposed closure action meets the conditions of Subpart D, B6.1 and would be a removal action under RCRA similar in scope to a removal action under CERCLA and would be completed within the CERCLA cost and time limits of $2,000,000 and a one year duration.

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
J. D. Wagoner, RL	C. M. Borgstrom, DOE-HQ	INCOMING: 9208725

Subject: NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) CATEGORICAL EXCLUSION (CX) DETERMINATION: CLOSURE OF THE 3718-F ALKALI METAL TREATMENT AND STORAGE FACILITY, 300 AREA, HANFORD SITE, RICHLAND, WASHINGTON

INTERNAL DISTRIBUTION

Approval	Date	Name	Location	w/att
		Correspondence Control	A3-01	X
		S. L. Bradley	B3-06	X
		R. H. Engelmann	H6-26	X
		G. W. Jackson, Assignee		X
		H. E. McGuire, Level 1		X
		G. T. Wells	H6-26	X
		J. L. Wise	N1-22	X
		EDMC	H4-22	X